

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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IN THE MATTER OF

RAHUL DEV MANCHANDA

FILED
U.S. BANKRUPTCY COURT
2023 DEC 27 P 2:11
INDEX NO. 23-11805
S.D. OF N.Y.
NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the annexed affirmation of Rahul Manchanda duly affirmed the 27th day of December 2023, the annexed Memorandum of Law and Exhibits, and all the Pleadings and Proceedings heretofore had herein, the Undersigned will move this Honorable Court at US SDNY Bankruptcy Court, 300 Quarropas Street White Plains, NY 10601-4150 on January 10, 2024 at 10 AM or as soon as Counsel can be heard for an order holding Zeichner Ellman & Krause LLP, IPFS Corporation, Lisa Chandler, Robert Guttman, Michael Davis in Civil and Criminal Contempt of Court pursuant to U.S. Federal Bankruptcy Law, willful violations of the Stay pursuant to 111 U.S.C. § 362.

Dated: December 27, 2023
New York, NY



Rahul Manchanda, Esq.
Manchanda Law Office PLLC
270 Victory Boulevard
New Rochelle, New York 10804
Tel: (212) 968-8600
Fax: (212) 968-8601

To: Zeichner Ellman & Krause LLP, IPFS Corporation, Lisa Chandler,
Robert Guttman, Michael Davis via e-mail and U.S. mail.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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IN THE MATTER OF) INDEX NO. 23-11805
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RAHUL DEV MANCHANDA) AFFIRMATION IN SUPPORT
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STATE OF NEW YORK }
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COUNTY OF WESTCHESTER }

RAHUL MANCHANDA, an Attorney duly licensed to practice law in the State of New York, affirms the following to be true under penalty of perjury:

1. I make this Affirmation in support of this Motion for Contempt of Court against Defendants in all respects based upon my personal knowledge of the facts and experiences that I relate herein, based upon information and belief, and based on the contents of the file.
2. On the grounds that these people continue to willfully fail to comply with this Honorable Bankruptcy Court through the Automatic Stay pursuant to 11 U.S.C. § 362 and Protection of this Honorable Court by continuing to engage in threatening, harassing, intimidating, litigating, terminating, and

violating federal bankruptcy protection and the stay;

2. On the grounds that even though these individuals repeatedly received written and electronic Notice of Chapter 7 Bankruptcy Filings as November 2023 (chapter 7 case 23-11805) and Debtor negotiated with Insurance Broker that he would be provided a tail ERP since this insurance company and Debtor negotiated a bargained for exchange of a 2016 Retroactive Date, they continue to ignore these notifications.
3. However, the above named individuals ignore this federal bankruptcy stay and continue with their threatening, harassing, intimidating, and litigating in this court;
4. Now these people demand that Debtor's negotiated insurance policy calling for a 2016 Retroactive Coverage Date be terminated, leaving Debtor unprotected in case any past clients file suit against Debtor;
5. Nothing less than sanctions, penalties, fines, and incarceration will persuade these Defendants to comply with this Honorable Court's Automatic Stay and Protection from continuing to engage in threatening, harassing, intimidating, litigating, collecting, terminating and violating federal bankruptcy protection and the stay;

6. If Defendants are not forced to comply with this Honorable Court's Automatic Stay and Protection from continuing to engage in threatening, harassing, intimidating, litigating, collecting, and violating federal bankruptcy protection and the stay, then these people will have reduced federal bankruptcy protection to a shambles;
7. Defendants' willful and intentional noncompliance with the Automatic Stay and Protection prohibiting their continuing to engage in threatening, harassing, intimidating, litigating, collecting, violating federal bankruptcy protection and the stay, and otherwise aggressive disregard for federal bankruptcy protection of this Honorable Court have defeated, impaired, impeded, and prejudiced Debtor's rights;
8. And for such other further relief as this Honorable Court deems just and proper, including contempt, costs, penalties, fines, incarceration, and sanctions against Defendants for willful violations of U.S. Federal Bankruptcy Law, willful violations of the Stay pursuant to 11 U.S.C. § 362, and in light of the information contained herein.

WHEREFORE, it is respectfully requested that this Motion be granted in all respects together with such other and further relief as this Honorable Court deems to be just and proper, including contempt,

costs, penalties, fines, incarceration, and sanctions against Defendants for violation of U.S. Federal Bankruptcy Law, willful violations of the Stay pursuant to 111 U.S.C. § 362, and in light of the information contained herein.

Dated: December 27, 2023
New York, NY



Rahul Manchanda

CERTIFICATE OF SERVICE

On December 27, 2023, I, Rahul Manchanda, served a copy of this Motion for Contempt of Court and any attached pages to Zeichner Ellman & Krause LLP, IPFS Corporation, Lisa Chandler, Robert Guttmann, Michael Davis via e-mail and U.S. mail.



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